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DECLARATION OF TOBY L. PLEVIN

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I, Toby L. Plevin, declare as follows:

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- I am attorney of record for plaintiff in the case captioned Bent Corydon vs Church of Scientology International et. al.
- 2. As noted by the moving papers, the document which the defendants herein seek to seal herein was filed in this action as an Exhibit to Plaintiff Bent Corydon's Motion for an Order Directing Non-Interference with Witness. That motion was filed on March 19, 1990.
- 3. Defendants make an attempt to justify their position by stating that the court file in an their lawsuit involving Gerald Armstrong, the signatory to the settlement agreement, was ordered sealed in 1986. However, that decision has no bearing on the present issue particularly since the document in question was never filed in that court file. I state this on personal knowledge since I reviewed that file during the period it was unsealed. Furthermore, counsel for the moving parties admitted that it was never filed in that action during proceedings regarding the unsealing.
- The moving parties intimate that I and my client were 4 . involved in some wrongdoing in obtaining a copy of the document. However, we obtained that agreement because Armstrong filed it, unsealed, on February 20, 1990 in the Court of Appeal in an appeal in which Corydon was a party. A true copy of the Petition to which it was attached and the agreement itself are attached hereto as Exhibit B.
 - I swear under penalty of perjury under the laws of the State

- 2 -

Dare DEC.11,1986

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SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

HONORABLEP & BRECKENRIDGE, JR JUDGE

C420153

Deputy Sheriff

R HART

, Deputy Clerk

N HARRIS

Reporter (Parties and counsel checked if present)

S YAKOUBIAN

GERALD ARMSTRONG.

CHURCH OF SCIENTOLOGY OF

Court Attendant

CONTOS & BUNCH

Counsel for JULIA DRAGOJEVIC I X- Plaintiff BY:

MICHAEL FLYNN

VS

Counsel for PETERSON & BRYNAN

X Defendant BY: JOHN G. PETERSØN

MICHAEL HERTZBERG Vfor M. Hubbard

also appearing, LENSKE, LENSKE &/

NACK DO COCERTINES

CALIFORNIA.

HELLER BY: LAWRENCE E. HELLER

TATURE OF PROCEEDINGS: JOINT EX-PARTE APPLICATION FOR DISMISSAL

Pursuant to stipulation of the parties, the cross-complaint is dismissed with prejudice.

Further orders are made pursuant to stipulation, including the following: The Court retains jurisdiction to enforce the settlement agreement; all documents surrendered to the court or marked as exhibits shall be returned to the Church of Scientelogy or its attorneys forthwith except six, 500-CCCCC, 500-KKKKK, 500-ILLLL, 500-00000, 500-PPPPP and 500-000000; the entire remaining record of this case, except the "Stipulated Sealing Order" and "Order Dismissing Action With Prejudice" filed this date, are ORDERED SEALED and not to be spened or inspected without prior order of Court.

The following listed documents are filed this date: Joint Stipulation of Dismissal, Order Dismissing Action With Prejudice, Stipulation for Return of Sealed Materials and Exhibits, Order for Return of Exhibits and Sealed Documents, and Stipulated Sealing Order.

EXHIBIT D

MINUTES ENTERED

COUNTY CLERK

12-11-86

(2) DEPT 57